

Message

From: Michael Honeycutt [Michael.Honeycutt@tceq.texas.gov]
Sent: 6/3/2020 9:06:53 PM
To: Casso, Ruben [Casso.Ruben@epa.gov]
Subject: Re: FYI - Final MON Update: Huntsman Performance in Conroe, Texas

Thanks

From: Casso, Ruben <Casso.Ruben@epa.gov>
Sent: Wednesday, June 3, 2020 3:46 PM
To: Michael Honeycutt <Michael.Honeycutt@tceq.texas.gov>
Subject: FYI - Final MON Update: Huntsman Performance in Conroe, Texas

FYI - Saw this in the final MON preamble

Final MON update: Huntsman Performance in Conroe, Texas
(Page 60-62 of 309 of Prepublication version of Final MON).

Response: The EPA has reviewed the updated equipment leak emissions data provided during the comment period by Huntsman Performance in Conroe, Texas, the second highest risk driving facility that was identified at proposal. We agree with the information provided that two emission units were incorrectly modeled as being subject to MON, when in fact, they are subject to other standards. As such, in the final rule these units are modeled at the whole facility-level only.

We have also updated Huntsman Performance's ethylene oxide equipment leak emissions using the updated emissions data provided by the facility, consistent with the EPA's standard practice of using the best available data. The EPA believes that the updated data represents the best available data because it is more recent (i.e., 2019), is based on actual emissions measurements, reflects recent physical and operating changes made to the process since the 2014 NEI emissions were reported, and conservatively considers results below the detection limit as being present at the detection limit.

After considering all updates made to the emissions data for Huntsman Performance, the ethylene oxide emissions before controls are applied are estimated to be approximately 0.03 tpy based on actual and allowable emissions, compared to roughly 0.26 tpy estimated at proposal. The pre-control cancer risks are estimated to be 20-in-1 million. After ethylene oxide-specific controls are applied, the estimated post-control cancer risks are also 20- in-1 million.

Risks are not reduced with the amendments because (1) storage tank and process vent controls have no effect since these are not sources of ethylene oxide emissions at this facility, and (2) equipment leak Control Option 1 has no effect because this facility already meets the LDAR requirements this option requires.